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Electronically filed on PACER

April 16, 2024

Lois Bloom  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11202

Medical Reimbursement Consultants, Inc. adv Allstate Insurance Company et al.  
1:23-CV-06572-NRM-LB  
CSG File No. 4017-24

Dear Magistrate Judge Bloom:

Please be advised that my law firm has just been retained by both Bradley Pierre, individually, and Medical Reimbursement Consultants, Inc. ("MRC") in connection with the above referenced matter. Adam Dressler, Esq. has also appeared Of Counsel to my law firm for the same parties. Notice of Appearances for us both were filed electronically on April 16, 2024.

I have spoken with both Nathan Tilden, Esq. and Matthew Conroy, Esq. representing Plaintiff Allstate and defendants Nexray and William Weiner, respectively, and we all join on consent in this request to the court to adjourn the deposition of Mr. Pierre personally, presently scheduled for April 24, 2024 as set forth in the Court's Scheduling Order dated March 28, 2024, until May 16, 2024 at 12pm.

This adjournment will enable myself and Mr. Dressler the time to meet with our clients and review all the pleadings and other filings in this case to date.

In addition, we have commenced settlement discussions for a global resolution and the additional time will provide us with the opportunity to pursue those settlement discussions as well. We are hopeful that this matter will be resolved prior to the May 16<sup>th</sup> date.

We thank the court for its courtesy and consideration herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Cary Scott Goldinger', with a stylized flourish at the end.

Cary Scott Goldinger, Esq.  
(CSG 4983)

Nathan Tilden, Esq. (via email and electronically)  
Matthew Conroy, Esq.(via email and electronically)  
Adam Dressler, Esq. (via email and electronically)